

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 20 CR 318
v.	)	
	)	Judge Robert Gettleman
OLALEKAN JACOB PONLE,	)	
a/k/a “Mark Kain” and “Mr. Woodbery”	)	

**UNITED STATES BILL OF PARTICULARS  
FOR FORFEITURE OF CERTAIN PROPERTY**

The United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby files the following Bill of Particulars.

Through the violation of 18 U.S.C. § 1343 as alleged in Counts One through Eight of the indictment, the United States seeks forfeiture of any property involved in or traceable to the defendant’s violation including, but not limited to 151.885720427 Bitcoin Cryptocurrency pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Dated: April 29, 2022

Respectfully submitted,

JOHN R. LAUSCH, JR.  
United States Attorney

By: /s/ Andrew Dixon  
ANDREW DIXON  
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